

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

Chapter 11

**FIELDWOOD ENERGY LLC, et al¹
Debtors.**

Case No. 20-33948 (MI)

Jointly Administered

**JOINDER AND RESERVATION OF RIGHTS OF BROUSSARD BROTHERS, INC. TO
BEDROCK PETROLEUM CONSULTANTS, LLC'S RESERVATION
OF RIGHTS AND LIMITED OBJECTION TO DIP FINANCING AND
CASH COLLATERAL MOTION
(Relates to Docket Nos. 22 and 192)**

Broussard Brothers, Inc. ("BBI") files this joinder to and reservation of rights with respect to the reservation of rights and limited objection filed by Bedrock Petroleum Consultants, LLC ("Bedrock") to *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing* [Docket No. 22] (the "DIP Motion"). In support of this reservation of rights, limited objection and joinder, BBI offers the following:

Background

1. BBI is an oil and gas service company, which provided (and continues to provide) services, labor, equipment, goods, and/or materials to the Debtors.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

2. As of the date of this filing, the Debtors owe BBI at least \$456,219.27 for services, labor, equipment, goods, and/or materials provided prior to the petition date. Copies of invoices itemizing these amounts are available upon request to BBI's counsel. BBI reserves its rights to recover interest, attorneys' fees, and other allowed costs.

3. BBI has and is entitled to assert and perfect mineral liens against certain of the Debtors' offshore assets (including any third parties' interest in such assets) pursuant to Tex. Prop. Code §§ 56.001 to 56.045, La. R.S. §§ 9:4861 to 9:4889, and other applicable law as well as any other liens permitted by applicable law.

4. Accordingly, BBI is preserving its lien rights pursuant to 11 U.S.C 546(b).

Joinder to Limited Objection

5. BBI joins the limited objection filed by Bedrock [Docket No. 192] in response to the DIP Motion, in its entirety and as if fully set forth herein, as the same relates to the interest held by BBI. BBI requests it also be listed in the proposed language.

6. BBI further reserve its rights to object to the entry of the Final DIP Order, absent the proposed order including provisions requested by Bedrock relating to the preservation of rights and remedies regarding statutory oil and gas mechanic's and materialman's liens.

7. BBI joins the limited objection filed by Bedrock out of an abundance of caution; generally supports the Debtors' efforts to reorganize; and recognizes the need for DIP Financing and continued use of cash collateral. BBI also hopes to support the Debtors' ongoing operations by amicably resolving its prepetition claims and continuing to provide services in the ordinary course of business and as authorized by this Honorable Court.

Reservation of Rights

8. BBI expressly reserves its rights to raise these objections and any other objections, or to join in any other objections relating to the DIP Motion, at any time prior to the final hearing

considering the DIP Motion, regardless of whether Bedrock's limited objection is resolved prior to such hearing.

9. BBI further reserves all rights with respect to this jointly administered bankruptcy case, all rights under any contracts, and all rights with respect to any claim it may assert or has asserted in this case, including, but not limited to, administrative priority claims that may arise, adequate protection for such expenditures, and all other rights in this case.

WHEREFORE, PREMISES CONSIDERED, BBI prays this Court grant it the relief requested herein, and the Court order such other and further relief the Court deems just and proper.

Respectfully submitted,

By: /s/ Victoria V. Theriot
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Certificate of Service

I hereby certify that on August 21, 2020, a true and correct copy of the foregoing was served by the Court's Electronic Case Filing System to all parties registered or otherwise entitled to receive electronic notices.

/s/ Victoria V. Theriot
Victoria V. Theriot